

U.S. DISTRICT COURT  
DISTRICT OF MAINE  
PORTLAND

UNITED STATES DISTRICT COURT & FILED  
DISTRICT OF MAINE

2024 AUG 22 P 1:08

U.S. BANK, N.A., as Trustee for LSF10  
Master Participation Trust,

vs.  
PLAINTIFF

FRANCES L. PLOURDE,

DEFENDANT

DEPUTY CLERK

) ANSWER TO COMPLAINT &  
REQUEST FOR FORECLOSURE  
DIVERSION PROGRAM MEDIATION  
)  
)  
)  
)  
)  
)  
)  
)

NOW COMES Defendant Frances Plourde, pro se, and responds to Plaintiff's Complaint as follows:

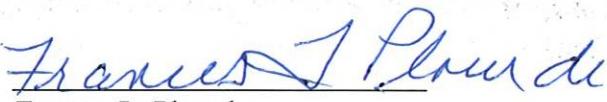
1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Denied. Answering further, upon information and belief, the proper party did not complete the alleged assignment
11. Admitted.
12. Admitted.
13. Qualified. Answering further, the corrective deed may have addressed the prior improper transfer, but it did not ratify the assessments, and specifically legal and other fees assessed in the interim.
14. Admitted.
15. Qualified. Answering further, while the letter stated these things, the letter does not reflect the discussions with the servicer after receipt of the letter.
16. Denied. Answering further, the servicer's representations modified the terms of the demand letter.
17. Admitted.
18. Admitted.
19. Denied. Answering further, there is no junior mortgage. Plaintiff references a line of credit that was at one time available.
20. Denied.
21. Denied.
22. Admitted.

23. Defendant reasserts and realleges her responses to Paragraphs 1-22.
  24. Admitted.
  25. Admitted.
  26. Admitted.
  27. Denied. Answering further, HAF funds addressed the arrearage through at least October 2023.
  28. Denied.
  29. Admitted.
  30. Denied.
  31. Admitted.
  32. Admitted.
  33. Admitted.
  34. Defendant reasserts and realleges her responses to Paragraphs 1-33.
  35. Admitted.
  36. Denied.
  37. Admitted.
  38. Admitted.
  39. Denied.
  40. Denied.
  41. Denied.
  42. Denied.
  43. Admitted.
  44. Defendant reasserts and realleges her responses to Paragraphs 1-43.
  45. Admitted.
  46. Admitted.
  47. Admitted.
  48. Denied.
  49. Admitted.
  50. Admitted.
  51. Denied.
  52. Denied.
  53. Denied.
  54. Denied.
  55. Denied.
  56. Admitted.
  57. Defendant reasserts and realleges her responses to Paragraphs 1-56.
  58. Admitted.
  59. Admitted.
  60. Denied.
  61. Denied.
  62. Admitted. There is no just or emergency. Plaintiff's claims are not based upon any facts which occurred prior to the filing of this complaint.
- AFFIRMATIVE DEFENSES**
63. Defendant reasserts and realleges his responses to Paragraphs 1-62.
  64. The Complaint is subject to the defense of duress.

23. Defendant 65. The Complaint is subject to the defense of unclean hands.  
24. Admitted  
25. Admitted  
26. Admitted  
27. Denied. Answering nothing, R&F funds addressed the answer to the original complaint, which was filed on August 14, 2023, and to the Maine State Foreclosure Diversion Program, together with such other and additional relief as it deems just and necessary.

23. Defendant 66. The Complaint is subject to the defense of illegality.  
24. Admitted  
25. Admitted  
26. Admitted

Dated at Portland, Maine, this 19<sup>th</sup> day of August 2024.

  
Frances L. Plourde